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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: MCKINSEY & CO., INC.
NATIONAL PRESCRIPTION OPIATE
CONSULTANT LITIGATION

This document relates to:

Case No. 3:21-cv-04386-CRB

Case No. 3:21-cv-05467-CRB

Case No.: 21-md-02996-CRB

**DECLARATION OF HUNTER J.
SHKOLNIK IN SUPPORT OF PLAINTIFFS'
MOTION FOR REMAND OR ABSTENTION**

DECLARATION OF HUNTER J. SHKOLNIK

Pursuant to 28 U.S.C. § 1746, I, Hunter J. Shkolnik, do hereby declare as follows:

1. I am a member of the bar of the State of New York and a partner of the Napoli Shkolnik law firm, counsel for Plaintiffs, The County of Genesee, The Town of Auburn, The City of Buffalo, The County of Chautauqua, The County of Chemung, The County of Chenango, The County of Clinton, The County of Cortland, The County of Hamilton, The City of Ithaca, The City of Kingston, The County of Livingston, The County of Madison, The City of Mount Vernon, The County of Niagara, The County of Orleans, The City of Poughkeepsie, The Town of Poughkeepsie, The County of Rensselaer, The City of Saratoga Springs, The County of Steuben, The County of Westchester, The County of Allegany, the Town of Amherst, the City of Amsterdam, the County of Cattaraugus, the County of Cayuga, the County of Cheektowaga, the County of Essex, the County of Franklin, the City of Lancaster, the County of Nassau, the City of Ogdensburg, the County of Otsego, the County of Putnam, the City of Rochester, the County of Saratoga, the County of Schoharie, the County of Schuyler, the County of Tioga, the County of Tompkins, the City of Tonawanda, the County of Warren, and the County of Yates (collectively, “Plaintiffs”) in the above-captioned cases.

2. I have personal knowledge of the statements set forth herein, except where otherwise indicated.

3. I make this Declaration in Support of Plaintiffs’ Consolidated Motion for Remand or Abstention, which is filed contemporaneously herewith.

4. Attached hereto as **Exhibit 1** is a true and correct copy of the order initiating the coordinated opioid litigation proceedings in the Suffolk County Supreme Court before Justice Garguilo.

5. Attached hereto as **Exhibit 2** is a true and correct copy of Case Management Order #2, dated September 5, 2018, issued in the coordinated opioid litigation proceedings in the Suffolk County Supreme Court before Justice Garguilo.

6. Attached hereto as **Exhibit 3** are true and correct copies of the March 24, 2021 Transfer Order in *Genesee County, et al. v McKinsey & Company, Inc.*, Index No. 400002/2021,

1 and July 7, 2021 Transfer Order in *Westchester County, et al. v McKinsey & Company, Inc.*, Index
2 No. 400004/2021.

3 7. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the Affidavit
4 of Service, dated February 24, 2020, filed in Purdue Pharma L.P.'s bankruptcy proceedings (*In re*
5 *Purdue Pharma L.P.*, No. 19-23649 (Bankr. S.D.N.Y.), Dkt. No. 872).

6 8. Attached hereto as **Exhibit 5** is a true and correct copy of a proof of claim filed by
7 Richard Sackler in Purdue Pharma L.P.'s bankruptcy proceedings (*In re Purdue Pharma L.P.*, No.
8 19-23649 (Bankr. S.D.N.Y.)), which was pulled from the website of Purdue's claims administrator,
9 <https://restructuring.primeclerk.com/purduepharma/Home-ClaimInfo>.

10 9. Attached hereto as **Exhibit 6** is a true and correct copy of Defendant McKinsey &
11 Company, Inc. United States' Memorandum of Law in Support of its Motion to Enter the Final
12 Consent Order and Judgment, filed in *The People of the State of New York v. McKinsey & Company,*
13 *Inc. United States*, Index No. 400001/2021 (N.Y. Sup., Suffolk County Feb. 26, 2021).

14 10. Attached hereto as **Exhibit 7** is a true and correct copy of the Nassau County Verdict
15 Sheet, dated, December 15, 2021, issued for the coordinated opioid litigation proceedings in the
16 Suffolk County Supreme Court before Justice Garguilo.

17 11. Attached hereto as **Exhibit 8** is a true and correct copy of the Attorney General of
18 New York's Memorandum of Law in Opposition to the Subdivisions' Motion to Intervene and
19 Objection to the Proposed Final Consent Order and Judgment and in Support of Entry of the
20 Judgment, filed in *The People of the State of New York v. McKinsey & Company, Inc. United States*,
21 Index No. 400001/2021 (N.Y. Sup., Suffolk County March 8, 2021).

22 12. Attached hereto as **Exhibit 9** is a true and correct copy of McKinsey's March 5, 2021
23 Brief In Support Of Defendants' Motion For Transfer Of Actions Pursuant To 28 U.S.C. § 1407
24 For Coordinated Or Consolidated Pretrial Proceedings filed in MDL No. 2996 before the JMPL.

25 13. I declare under penalty of perjury that the foregoing is true and correct.
26 Executed this 14th day of June, 2024, in Santurce, Puerto Rico.

27 /s/ Hunter J. Shkolnik
28 Hunter J. Shkolnik

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 14, 2024, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will also transmit a Notice of Electronic Filing to all counsel of record.

/s/ Hunter J. Shkolnik
HUNTER J. SHKOLNIK